

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: HAINES C. BROWN, IV and) Chapter 13
KARYN P. BROWN,)
Debtor(s)) Bky. No. 19-16896-PMM

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Stephen M. Otto, Esquire, has filed Debtor's Motion to Modify Confirmed Plan, with the court.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **December 23, 2021**, you or your attorney must do all of the following:

(a) *file an answer explaining your position at:*

Clerk
U.S. Bankruptcy Court
Gateway Building
201 Penn Street, Suite 400
Reading PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above and

(b) *mail a copy to the movants' attorney:*

Stephen M. Otto, Esquire
833 N Park Road, Ste 206
Wyomissing PA 19610

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **January 6, 2022 at 10:00 a.m.**, in Courtroom 4th Fl, United States Bankruptcy Court, The Gateway Building, 201 Penn St, Reading, Pennsylvania 19601.

4. If a copy of this motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the bankruptcy clerk's office at 610-208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

Dated: December 2, 2021

By: /s/Stephen M. Otto
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